1 2 3 4 5 6 7 8	QUINN EMANUEL URQUHART & SULLIVA Charles K. Verhoeven (Bar No. 170151) charlesverhoeven@quinnemanuel.com David A. Perlson (Bar No. 209502) davidperlson@quinnemanuel.com Melissa Baily (Bar No. 237649) melissabaily@quinnemanuel.com John Neukom (Bar No. 275887) johnneukom@quinnemanuel.com Jordan Jaffe (Bar No. 254886) jordanjaffe@quinnemanuel.com 50 California Street, 22 <sup>nd</sup> Floor San Francisco, California 94111-4788 Telephone: (415) 875-6600 Facsimile: (415) 875-6700	N, LLP	
9	Attorneys for WAYMO LLC		
10	UNITED STATES DISTRICT COURT		
11	NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION		
12	WAYMO LLC,	CASE NO. 3:17-cv-00939-WHA	
13	Plaintiff,	DECLARATION OF FELIPE CORREDOR IN SUPPORT OF	
14	VS.	PLAINTIFF WAYMO LLC'S ADMINISTRATIVE MOTION TO FILE	
15	UBER TECHNOLOGIES, INC.; OTTOMOTTO LLC; OTTO TRUCKING	UNDER SEAL PORTIONS OF ITS OPPOSITION TO DEFENDANTS UBER	
16	LLC,	TECHNOLOGIES, INC. AND OTTOMOTTO LLC'S PRECIS IN	
17	Defendants.	SUPPORT OF REQUEST TO FILE MOTION IN LIMINE TO EXCLUDE	
18		TESTIMONY AND OPINIONS OF WAYMO EXPERT LAMBERTUS	
19		HESSELINK ON TS 25	
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01980-00104/9680348.1		CASE No. 3:17-cv-00939-WHA	

CORREDOR DECLARATION ISO WAYMO'S ADMINISTRATIVE MOTION TO SEAL

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I, Felipe Corredor, declare as follows:

- 1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.
- 2. I make this declaration in support of Waymo's Administrative Motion to File Under Seal Portions of Its Opposition to Defendants Uber Technologies, Inc. and Ottomotto LLC's Precis in Support of Request to File Motion in Limine to Exclude Testimony and Opinions of Waymo Expert Lambertus Hesselink on TS 25 ("Waymo's Opposition"), filed concurrently herewith (the "Administrative Motion"). The Administrative Motion seeks an order sealing the following materials filed concurrently herewith:

Document	Portions to Be Filed	Designating Party
	Under Seal	
Waymo's Opposition	Highlighted Portions	Waymo (green
		highlighting);
		Defendants (blue
		highlighting)

- 3. Specifically, the portions of Waymo's Opposition identified in the table above as designated by Waymo contain or refer to trade secret information, which Waymo seeks to seal.
- 4. The portions of Waymo's Opposition identified in the table above contain, reference, and/or describe Waymo's trade secrets. The information Waymo seeks to seal includes the confidential design and functionality of Waymo's proprietary autonomous vehicle system, including its technical specifications and/or LiDAR designs, which Waymo maintains as secret. I understand that these trade secrets are maintained as secret by Waymo (Dkt. 25-47) and that the trade secrets are valuable to Waymo's business (Dkt. 25-31). The public disclosure of this information would give Waymo's competitors access to descriptions of the functionality or features of Waymo's autonomous vehicle system. If such information were made public, I understand that Waymo's competitive standing would be significantly harmed.

1 2	5. Waymo's request to seal is narrowly tailored to those portions of Waymo's Opposition that merit sealing.
2	that merit sealing.
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3	6. Waymo only seeks to seal the portions of Waymo's Opposition identified in the table
4	above as designated by Defendants because Waymo believes such information is considered
5	confidential or non-public by Defendants.
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7	I declare under penalty of perjury under the laws of the State of California and the United
8	States of America that the foregoing is true and correct, and that this declaration was executed in Sar
9	Francisco, California, on November 13, 2017.
10	By /s/ Felipe Corredor
11	Felipe Corredor Attorneys for WAYMO LLC
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14	SIGNATURE ATTESTATION
15	Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
16	filing of this document has been obtained from Felipe Corredor.
17	/s/ Charles K. Verhoeven
18	Charles K. Verhoeven
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